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May 25, 2018

**VIA ECF**

Hon. Judge Lisa M. Smith  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St., Courtroom: 520  
White Plains, NY 10601-4150  
[chambersNYSDSmith@nysd.uscourts.gov](mailto:chambersNYSDSmith@nysd.uscourts.gov)

Re: *Can't Stop Productions, Inc. v. Sixxvus, Ltd. et al.* 7:17-cv-06513-CS

Hon. Judge Smith:

As you know, we represent the defendants in the above referenced action. We write in connection with Defendants' motion to enforce the Settlement Agreement, to specifically request that the Court issue an order allowing Defendants to temporarily file the un-redacted copies of Defendants' memorandum of law and Exhibits 2-9 and 11 to the Declaration of Gary Adelman, that are being submitted in connection with Defendants' motion under seal.

As Your Honor may recall at the March 28, 2018 Settlement Conference, Intervenor requested the Settlement Agreement be confidential, which was mutually agreed to with one exception as also agreed to on the record. As such, Defendants are filing their instant motion so that the exhibits and supporting papers that are being filed on ECF, which discuss or reflect specific terms of the Settlement Agreement, are redacted.

We respectfully request that Defendants be allowed to file un-redacted copies of their memorandum of law and Exhibits 2-9 and 11, attached to the Declaration of Gary Adelman, under seal. Furthermore, to the extent that the Court requires a more specific showing, Defendants respectfully request that after all parties have submitted their response and reply papers that any party who wishes for any of these materials to remain under seal be allowed to file a letter motion identifying those materials and providing the reasons for permeant sealing with in accordance with *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006).

We appreciate the Court's time and consideration, and should Your Honor need any further information, we are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM' with a colon, representing Sarah M. Matz.

Sarah M. Matz, Esq.

Cc.     *(Via ECF)*  
          Counsel for Plaintiff  
          Karen Willis